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**Hearing Date: June 29, 2015; 10:00 a.m.**  
**Objection Deadline: June 22, 2015**

*Attorneys for SDF81 45 John Street 1 LLC  
and SDF81 45 John Street 2 LLC*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

HS 45 JOHN LLC,

Debtor.

Chapter 11

Case No. 15-10368-shl

**NOTICE OF MOTION**

Hon. Sean H. Lane  
United States Bankruptcy Judge

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**PLEASE TAKE NOTICE**, that upon the Application of SDF81 45 John Street 1 LLC and SDF81 45 John Street 2 LLC (the “Secured Creditors”), interested parties in this Chapter 11 case, by and through their attorneys Kriss & Feuerstein LLP, the Secured Creditors will move this Court before the Honorable Sean H. Lane, United States Bankruptcy Judge at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Courtroom 701, New York, New York 10004, on the 29<sup>th</sup> day of June, 2015 at 10:00 a.m., or as soon thereafter as counsel can be heard for an Order pursuant to 11 U.S.C. § 362(d)(3), for relief from the automatic stay, waiving the 14 day stay imposed by FED. R. BANKR.P. 4001(a)(3) and for such further and different relief as the Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE**, that objections, if any, to the instant Application must be made in writing and received in the Bankruptcy Clerk’s Office, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 and by the undersigned, Kriss & Feuerstein LLP, 360 Lexington Avenue, Suite 1200, New York,

New York 10017, no later than *seven (7) days* prior to the hearing date set forth herein.

Dated: New York, New York  
June 1, 2015

KRISS & FEUERSTEIN LLP  
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and SDF81 45 John Street 2 LLC*

By: *s/ Jerold C. Feuerstein*  
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